IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GREGORY THOMAS BERRY, *et al.*	**:**	CASE NO. 3:11-CV-754
Plaintiffs,	**:**	(Judge James R. Spencer)
v.	**:**	
LEXISNEXIS RISK & INFORMATION ANALYTICS GROUP, INC., *et al.*	**:**	
	:	
Defendants.	**:**	

STIPULATION REGARDING CLASS SETTLEMENT ORDER

The parties respectfully stipulate, subject to the Court's approval, as follows:

1. During the course of class administration, the class administrator was contacted by 154 individuals who identified themselves as having been damaged by an inaccuracy in an Accurint report about them and/or stated that they should be included in the Rule 23(b)(3) class along with the approximately 31,000 class members previously identified. The parties stipulate that the Rule 23(b)(3) settlement class as defined in the Court's September 5, 2014 Order shall be amended as set out below so as to include these additional individuals:

> All persons residing in the United States of America (including its territories and Puerto Rico) who, from October 1, 2006 through the date when the Court enters its Preliminary Approval Order, requested a copy of an Accurint Reports containing information about themselves or initiated or submitted a dispute or other inquiry regarding an Accurint Report to any of the Defendants or any of their predecessors or affiliates, or who contacted the Settlement Administrator herein to advise that they believed they had otherwise been damaged by the sale of an Accurint report in the class period. Excluded from the Rule 23(b)(3) Settlement Class are counsel of record (and their respective law firms) for any of the Parties; and the presiding judge in the action and his staff, and all members of their immediate family.

2. Neither the benefit payable to Rule 23(b)(3) Settlement Class members nor the amount payable under Section 5.7 of the Settlement Agreement to a cy pres

recipient shall be affected by the amendment described above. The benefit amount payable to Rule 23(b)(3) settlement class members under Section 5.7 of the Settlement Agreement shall be calculated by dividing the amount remaining in the Escrow Account after payments of Class Counsel's fees and costs and the Service Awards by the number of persons in the Rule 23(b)(3) Settlement Class before the amendment described above. The maximum amount of notice costs for which Defendants might be reimbursed under Section 5.7 of the Settlement Agreement shall be reduced by the aggregate value of benefit checks cashed by the persons added to the Rule 23(b)(3) Settlement Class by paragraph 1 above.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: November 11, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November, 2016, I electronically filed the foregoing document with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants.

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